

IBM

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IBM Research and Development, Inc.

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February 18, 1994

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street N.W.
Room 222
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Mr. Caton:

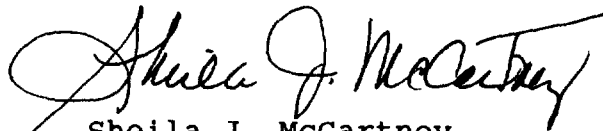
Enclosed are an original and nine copies of the Reply Comments of IBM Research and Development, Inc. and International Business Machines Corporation in the above-referenced proceeding.

We respectfully request that the Commission accept these late filed Reply Comments.

Questions regarding this document should be directed to the following address or phone number:

Sheila McCartney, Esq.
IBM Corporation
208 Harbor Drive
Stamford, CT 06904
(203) 973-7971
(203) 973-6653 (Fax)

Sincerely,



Sheila J. McCartney
Senior Counsel

SJM:cs
Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them

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PR Docket No. 92-235

REPLY COMMENTS OF IBM RESEARCH AND DEVELOPMENT, INC. and
INTERNATIONAL BUSINESS MACHINES CORPORATION

IBM Research and Development, Inc. ("IBM R&D") is a wholly owned subsidiary of International Business Machines Corporation ("IBM") and a licensee of the Commission. IBM R&D and IBM hereby submit the following reply comments in response to the Notice of Proposed Rulemaking which the Commission issued in the above-captioned proceeding on November 6, 1992. IBM R&D and IBM respectfully request the Commission to accept these late filed Reply Comments and consider them as part of the proceeding.

IBM is a manufacturer and therefore has concerns regarding the proposal to consolidate radio services if IBM would be placed in a broad pool consisting of a wide diversity of user groups.

It is IBM's view that manufacturers should not be required to share channels with disparate classes of users. For example, sharing a pool with the Business Radio Service (everything from fast food restaurants to tow trucks) or the Special Industrial Radio Service (which includes farmers and ranchers, for example) would dramatically increase the risk of interference with IBM's manufacturing transmissions. The reason is that many of the users in such disparate classes utilize unsophisticated systems that may transmit after minimal channel monitoring.

The types of radio systems for these businesses, characterized above, have nothing in common with the sophisticated radio systems IBM and many other manufacturers operate. IBM manufacturing sites have a number of highly sensitive applications which require a well coordinated channel. A few examples of these applications are error-free movement of hazardous material at our plants; providing effective security during a crisis, such as the recent earthquake in California; and crane control during construction. Because of our large investment in radio frequency systems, the amount of traffic that is generated across an IBM licensed system, and the sensitivity of the activities controlled by them, we need to be assured that the channel is well coordinated, taking into account the special needs of the manufacturer, and is available only to users of similar size, usage, and sophistication.

Thus, if the Commission consolidates private radio services, we believe some form of grouping mechanism should be adopted to continue the common and exclusive use of channels among manufacturers and other basic industrial users who have shared the bulk of their frequencies for many years. For example, manufacturers could be grouped with the Forest, Power and Petroleum Radio Services.

Over the years, IBM has initiated and maintained a radio program to ensure compliance with the Commission's rules and regulations. This program, which is similar to ones instituted by Ford and Boeing, is predicated on working with similar sized users under the Commission's present frequency allocation scheme. To date, it has worked very well, and we are adverse to changing it, especially if a large capital investment is required to eliminate the risks described above.

Respectfully submitted,

IBM RESEARCH AND DEVELOPMENT,
INC. and INTERNATIONAL
BUSINESS MACHINES CORPORATION

Date:

2/22/94

By:



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Their Attorney